UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

EFED Document

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PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Meeting of the Reregistration Assessment Panel (RAP)

FROM: Allan S. Abramson, Acting Director
Special Review and Reregistration Division (H7508W)

TO: Addressees

The meeting of the Reregistration Assessment Panel (RAP) is scheduled for **Wednesday, September 11, from 2:00 PM - 4:00 PM in room 1119 in CM2.** The reregistration eligibility of the following chemicals will be discussed:

Dried Blood
Sodium and Potassium Nitrates
Carbon and Carbon Dioxide

Attached are copies of the above Reregistration Eligibility Documents (REDs) for your review. Summarized below is a brief description of each chemical and its proposed reregistration decision.

Dried Blood

The active ingredient dried blood, combined with thiram, naphthalene and tobacco dust, is registered in three end use products as a rabbit and dog repellent. These products are dust formulations for use around ornamental plants, trees, and shrubs.

The data base to support the reregistration of dried blood is complete. No further generic data are required. Product specific data will be called in for products containing dried blood. The data available support the conclusion that current uses of dried blood will not result in unreasonable adverse effects to humans or the environment.

Sodium and Potassium Nitrates

The active ingredients sodium and potassium nitrates, in combination with carbon and sulfur, are registered in six end use products as a rodenticide or predacide. These products are incendiary cartridge formulations for use in pest burrows. These products are also included in the Carbon and Carbon Dioxide RED.

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As of August 29, 1991 the RED team was not able to come to a consensus concerning risk management of ecological effects from the gas cartridges, please see the attached issue paper.

Some generic product chemistry data are being called in for potassium nitrate. However, no other generic data are currently required.

Carbon and Carbon Dioxide

The active ingredient carbon, in combination with sodium and potassium nitrate, and sulfur, is registered in the same six end use products noted above for use in pest burrows for rodent and predator control.

Carbon dioxide is registered in four end use products as an insecticide. These products are pressurized gas or liquid for use as a fumigant in enclosed areas.

The generic data bases supporting carbon and carbon dioxide are complete. No further generic data are required. Product specific data will be called in for products containing carbon and carbon dioxide. Again, the RED team was not able to come to a consensus concerning risk management of ecological effects from the gas cartridges, please see the attached issue paper.

Reregistration Eligibility

I propose that all products containing dried blood, sodium or potassium nitrate, or carbon or carbon dioxide as an active ingredient be declared eligible for reregistration. The data available support the conclusion that current uses of these active ingredients will not result in unreasonable adverse effects to humans or the environment, except for the concern for nontarget animals expressed by EFED. I am hopeful the Team can reach a regulatory solution before the RAP meeting.

If you have any questions on the above REDs, please call: Ernie Dobbins (Dried Blood) at 308-8071; Mark Wilhite (Sodium and Potassium Nitrate) at 308-8072; or Virginia Dietrich (Carbon and Carbon Dioxide) at 308-8157.

Addressees

OPP Office Director
OPP Deputy Director
OPP Division Directors
Bill Jacobs, PSPS
Kevin Lee, OGC
Don Viviani, OPPE

cc: Respective Team Members
Attachments

Attachment

Restricted Use for Gas Product Cartridges

Background: There are currently six products of this type. All are for control of pests in burrows. Target pests by product are listed below. Note that four product labels list a broad spectrum of pests. Two are for predators only.

REG.NO	Ground Wasp	Mole	Rat	Ground Squirrel	Wood Chuck	Skunk	Prairie Dog	Coyote	Red Fox	Pocket Gopher
192-49	X	X		X						X
358-137		X		X	X					
10551-1		X	X	X	X	X				X
56228-2				X	X		X			
56228-21								X		
ND-880001									X	

USDA, the major registrant (56228), has provided the Agency with information concerning use of their products. The most widely used product (56228-2) is mainly applied to control ground squirrels in California or woodchucks in the East. It is typically distributed through farm supply stores. Very little is applied by Animal Damage Control (ADC) personnel. The two other USDA products are only used to control predators-- coyote and red fox. These are mainly applied by ADC personnel, although the label does not currently require this. Residential/homeowner use appears largely confined to the non-USDA products.

Issue: EEB is concerned about the effect of these products on non-target species which may utilize burrows and has proposed that the following changes be made in the current use of these products:

- o When applied to control pocket gophers, woodchucks, prairie dogs, coyotes and red foxes, use should be restricted to ADC personnel;
- o For control of moles, rats, skunks and ground squirrels, use should be restricted to certified or ADC applicators;
- o Residential/homeowner use may be kept as "general" since burrows of typical target pests are less likely to contain non-target animals.

Discussion: In analyzing this issue key questions include (1) what are the likely impacts on the registrants and subsequent availability of products to the public? and (2) will use restrictions adequately address the problem?

The proposed changes would involve extensive relabelling of all products. Availability of at least the four general purpose products will likely be significantly impacted. It is not clear at this point if any products are exclusively residential use. USDA

believes use restrictions would limit use of their products to an unreasonable extent, and that the number of Animal Damage Control personnel falls far short of the number of such qualified individuals which would be required to comply with the proposed changes.

Historically, the EPA certification program has not specifically focussed on this problem. Actual use of these products is fairly simple. The difficulty is in ascertaining if a burrow contains target and/or non-target species. This requires careful observations and timing of the application by the user. This might be helped by some training. Presumably ADC personnel are more likely than other users to avoid use against non-targets, however, according to USDA, there are so few of them (many states only share one or two) that major use patterns, i.e., ground squirrel and woodchuck control, could not be covered.

There is only limited information available on the impact of gas cartridges on non-target species. One study provided by USDA indicated that out of 200 woodchuck burrows treated with cartridges, 97 woodchucks and four non-target animals-- three deer mice and one rabbit-- were killed. Other information suggests that up to 27 non-target species may inhabit burrows of certain target pests.

Options: The following were considered by the team; none were recommended:

1. Enhanced labeling with emphasis on the need to look for signs of target and non-target species before using one of these devices. EEB believes, while helpful, this will not adequately address the problem.

2. Restricted use classification required for all rural-use products. Any products that are exclusively residential would be kept "general". It did not appear reasonable to many team members that a regulatory line could be drawn around residential/ homeowner use.

3. Application only by Animal Damage Control personnel as a label requirement for the cartridges used for large predator control. This situation largely already exists in practice due to the nature of these targets, however the issue of non-targets for other products remains unaddressed.

4. Calling in additional data, i.e., field monitoring studies, to justify not altering the current use of these products. Some team members felt these studies may not adequately resolve the question while placing a heavy financial burden on registrants. In addition, should a RED be issued if such a significant data gap is still outstanding?